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PLEASE REPLY TO:

Stuart

August 25, 2010

VIA FEDERAL EXPRESS

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** NY Bar
* TN Bar
** CT Bar
*** MA Bar
* PA Bar
** VA Bar
*** GA Bar
* NC Bar
*** MS Bar
† LA Bar
*** AR Bar
° Not Licensed in FL

The United States Bankruptcy Court
Southern District of New York
Honorable Robert E. Gerber
Courtroom 621
One Bowling Green
New York, NY 10004-1408

Re: Hawkins vs. General Motors Corp. and National Car Rental
and Alamo Rent-A-Car
09-50026(REG)

Dear Honorable Gerber:

Enclosed please find the Alternative Dispute Resolution Notice in the above matter.
At this time we do not have consent to agree or reject the Settlement Offer.

If you have any questions do not hesitate to contact us.

Sincerely,

**GARY, WILLIAMS, FINNEY,
LEWIS, WATSON & SPERANDO, P.L.**

Donald N. Watson, Esquire
For the Firm
DNW/mw
encl.

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

| | |
|---|--------------------------|
| -----X | |
| In re | : Chapter 11 Case No. |
| MOTORS LIQUIDATION COMPANY, <i>et al.</i> , | : 09-50026 (REG) |
| f/k/a General Motors Corp., <i>et al.</i> | : |
| Debtors. | : (Jointly Administered) |
| -----X | |

ALTERNATIVE DISPUTE RESOLUTION NOTICE

Service Date: 8/3/2010

Matter Name: HAWKINS BARBARA

Notice Address:

C/O GARY WILLIAMS PARENTI FINNEY LEWIS MCMANUS
221 E OSCEOLA ST
STUARY, FL 34994

| <u>Designated Claim Number</u> | <u>Amount Stated in Proof of Claim</u> | <u>Claim Amount Cap</u> |
|--------------------------------|--|-------------------------|
| 39218 | \$25,000,000.00 | N/A |
| 39219 | \$25,000,000.00 | N/A |
| 39220 | \$25,000,000.00 | N/A |
| 39221 | \$25,000,000.00 | N/A |
| 39222 | \$25,000,000.00 | N/A |

Deadline to Respond: 8/24/2010

By this notice (the “**ADR Notice**”), Motors Liquidation Company (f/k/a General Motors Corporation) and its affiliated debtors, as debtors in possession (collectively, the “**Debtors**”) designate the above-identified claim (the “**Designated Claim**”) in the Debtors’ chapter 11 cases and submit the Designated Claim to alternative dispute resolution, pursuant to the procedures (the “**ADR Procedures**”) established by the Order Pursuant to 11 U.S.C. § 105(a) and General Order M-390 Authorizing Implementation of Alternative Dispute Resolution Procedures, Including Mandatory Mediation (the “**ADR Order**”), entered by the United States Bankruptcy Court for the Southern District of New York (the “**Bankruptcy Court**”) on February 23, 2010. A copy of the ADR Procedures is posted on the Debtors’ website at www.motorsliquidation.com under the Claims Information tab. You may also contact the Debtors at 1-800-414-9607 or by e-mail at claims@motorsliquidation.com with questions about this matter.

The Debtors have reviewed your Designated Claim and, pursuant to the ADR Procedures, offer the amounts set forth below for allowance of your Designated Claim as [a] prepetition general unsecured nonpriority claim in full satisfaction of the Designated Claim (the "**Settlement Offer**").

*You are required to return this ADR Notice with a Claimant's Response (as defined below) to the Settlement Offer by no later than the **Deadline to Respond** indicated above to:*

Motors Liquidation Company
2101 Cedar Springs Road, Suite 1100
Dallas, TX 75201
Attn: ADR Claims Team
claims@motorsliquidation.com

In addition, to the extent your most recent proofs) of claim not: (a) state the correct amount of your Designated Claim; (b) expressly identify each and every cause of action and legal theory on which you base your Designated Claim; (c) include current, correct, and complete contact information of your counsel or other representative; or (d) provide all documents on which you rely in support of your Designated Claim, you hereby are requested to provide all such information and documentation with your Claimant's Response.

If you do not return this ADR Notice with the requested information and a Claimant's Response to the Settlement Offer to Debtors so that it is received by the Deadline to Respond, your Designated Claims will be subject to mandatory mediation as set forth in Section II.B of the ADR Procedures.

IN ADDITION, YOU ARE REQUIRED TO INDICATE EXPRESSLY WHETHER YOU CONSENT TO **BINDING ARBITRATION** IF YOUR DESIGNATED CLAIM CANNOT BE SETTLED. PLEASE MARK THE BOX BELOW INDICATING WHETHER YOU (i) CONSENT TO **BINDING ARBITRATION** OR (ii) **DO NOT** CONSENT TO (AND SEEK TO **OPT OUT OF**) **BINDING ARBITRATION**. PLEASE NOTE THAT YOUR CONSENT TO **BINDING ARBITRATION** CANNOT SUBSEQUENTLY BE WITHDRAWN. IN ADDITION, ANY ATTEMPT TO OPT OUT OF **BINDING ARBITRATION** IN THE RESPONSE TO THIS ADR NOTICE SHALL BE INEFFECTIVE IF YOU PREVIOUSLY HAVE CONSENTED IN WRITING (EITHER PREPETITION OR POSTPETITION) TO **BINDING ARBITRATION** AS A MEANS TO RESOLVE YOUR CLAIM.

Details about the arbitration process, including the sharing of fees, are set forth in Section II.C of the ADR Procedures.

YOU MUST RESPOND TO THE FOLLOWING SETTLEMENT OFFER:

Settlement Offer: The Debtors offer you an allowed general unsecured, nonpriority claim in the amount of **\$500,000.00** against **Motors Liquidation Company** in full satisfaction of your Designated Claim, to be satisfied in accordance with any plan or plans of reorganization confirmed and implemented in the Debtors' chapter 11 cases.

The only permitted response (the "**Claimant's Response**") to the Settlement Offer are (a) acceptance of the Settlement Offer or (b) rejection of the Settlement Offer coupled with a counteroffer (a "**Counteroffer**"). Accordingly, please select your Claimant's Response below:

Please indicate below if you accept or reject the Debtors' Settlement Offer by marking the appropriate box. If you reject the Settlement Offer, please make your counteroffer where indicated.

☐ I/we agree to and accept the terms of the Settlement Offer.

or

☐ I/we reject the Settlement Offer. However, I/we will accept, and propose as a Counteroffer, the following allowed claim in full satisfaction of the Designated Claim, to be satisfied in accordance with any plan or plans of reorganization confirmed and implemented in the Debtors' chapter 11 cases:

Debtor: _____

Amount: \$ _____

Priority: unsecured nonpriority claim (presumed) or ☐ other:* _____

**Note - If you choose a different priority, you must attach an explanation and any relevant documentation.*

Section II.A.3 of the ADR Procedures sets forth the restrictions on Counteroffers. Your Counteroffer may not (a) improve the priority sets forth in your most recent timely-filed proof of claim or amended proof of claim, or (b) exceed the lesser of the Claim Amount Cap (as defined in the ADR Order) or the amount set forth in your most recent timely-filed proof of claim(s) or amended proof of claim. You may not amend your proof of claim solely for the purpose of proposing a Counteroffer of a higher amount or a better priority.

Please indicate below whether you consent to binding arbitration for your Designated Claim by marking the appropriate box.

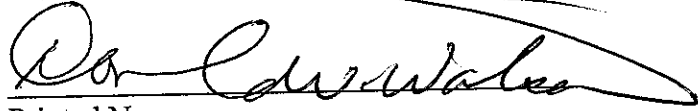
☐ I/ WE CONSENT TO BINDING ARBITRATION.

or

☒ I/WE DO NOT CONSENT TO BINDING ARBITRATION.

[Signature of the Designated Claimant's Authorized
Representative]

By:

A handwritten signature in black ink, appearing to read "Don Edwards" or similar, written over a horizontal line.

Printed Name

DONALD N. WATSON